

# SNOW, CHRISTENSEN & MARTINEAU

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November 3, 2008

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Thurman & Sutherland 1886  
Thurman, Sutherland & King 1888  
Thurman, Wedgwood & Irvine 1906  
Irvine, Skeen & Thurman 1923  
Skeen, Thurman, Worsley & Snow 1952  
Worsley, Snow & Christensen 1967

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To Contact Writer:

## VIA HAND-DELIVERY

DEPARTMENT OF NATURAL RESOURCES  
WATER RIGHTS  
1594 W. North Temple  
Salt Lake City, UT 84116-3154

**Re: *Comments of Uintah Water Conservancy District on  
Proposed Rule R655-16 Relating to Sole Supply for Supplemental Water Rights***

Dear Mr. Olds:

Uintah Water Conservancy District ("UWCD") submits the following comments on proposed Rule R655-16 -- Administrative Procedures for Defining Beneficial Uses for Supplemental Water Rights, published in the Utah State Bulletin August 1, 2008 (the "Proposed Rule").

UWCD is the local sponsor and administrator of the Vernal and Jensen Units of the Central Utah Project. UWCD provides, or will provide, some 60,000 acre-feet on a long term average from the Vernal and Jensen Units and other UWCD water rights for supplemental irrigation and M&I water in Uintah County. As such, UWCD is concerned about the potential effects of the Proposed Rule.

UWCD believes the Proposed Rule is unnecessary and flawed in many respects, and directs the State Engineer's attention to those comments submitted by the Provo River Water Users Association and other local sponsors of other federal storage projects.

UWCD wishes to specifically emphasize the onerous nature and unnecessarily broad reach of the Proposed Rule.

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UWCD respectfully requests the State Engineer abandon its efforts on this Proposed Rule as it appears to be unnecessary. However, should the State Engineer advance its efforts in this regard, UWCD requests and recommends the Proposed Rule be modified to include a critical exception for those water rights that support Utah's federal storage projects and their local sponsors.

UWCD looks forward to being an active part of this ongoing rulemaking process.

Thank you for your attention to this matter.

Very truly yours,

SNOW, CHRISTENSEN & MARTINEAU



Shawn E. Draney  
Scott H. Martin  
Counsel for Uintah Water Conservancy District

cc: Client

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